

Honorable Thomas T. Glover
Chapter 13
Hearing Location: Bremerton
Hearing Date: December 19, 2008
Hearing Time: 9:30 a.m.
Response Date: December 12, 2008

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

In re)	Chapter 13 Bankruptcy
)	
)	Case No. 08-13292
BRIAN A. MOLLET AND)	
JULIA A. MOLLET,)	RESPONSE TO
)	MOTION FOR RELIEF
)	FROM AUTOMATIC STAY OR IN THE
Debtor.)	ALTERNATIVE FOR ADEQUATE
)	PROTECTION

Debtors, Brian A. Mollet and Julia A. Mollet, by and through their attorney, Norman K. Short, in response to the Motion for Relief from Stay filed by Household Realty Corporation, state as follows:

It is the debtors' position that they have an equitable interest in the family home which is the subject property at issue herein, and keeping the home is necessary for their reorganization. It is the debtors' intent to bring their plan payments current, request an order to provide pre-confirmation payment of post-petition arrearages to Household Realty Corporation and to provide for the pre-petition arrearages through their plan and make timely monthly plan payments to adequately provide for the debt to Household Realty Corporation.

RESPONSE TO
MOTION FOR RELIEF FROM AUTOMATIC STAY

1 of 2

◆ HENDERSON, JONES & SHORT, PS ◆

1155 Bethel Avenue
Port Orchard, Washington 98366
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1 Debtors have recently paid into the plan the approximate sum of \$6,000.00 and desire to provide
2 for pre-confirmation payment of the post petition delinquent monthly payments through December, 2008
3 in the amount of \$ 6314.75.
4

5 Therefore, debtors respectfully request that Household Realty Corporations Motion for Relief
6 from Stay be denied.

7 Dated this 12th day of December, 2008.

8 HENDERSON, JONES & SHORT, P.S.
9

10 NORMAN K. SHORT, WSBA #22925
11 Attorney for Debtors
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RESPONSE TO
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2 of 2

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